

ANDREA BEATTY RINIKER
Director



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

September 10, 1987

Mr. Jeff Webb
Superfund Group
EPA Region 10, HW-113
1200 Sixth Avenue
Seattle, Washington 98101

Dear Mr. Webb:

Jeff
Comments on Disposal of Waste at American
Crossarm and Conduit Co. Site, Chehalis,
Lewis County

I am writing you this letter to express Ecology's desires and concerns for EPA's proposed work at the American Crossarm site. Ecology is very supportive of thermal destruction/treatment for the waste generated during the emergency site stabilization work. Any of the thermal treatment options are highly preferred by Ecology over the landfilling option. Thermal treatment would permanently eliminate the environmental and public health threat from the waste at the American Crossarm site. It could also serve as a shining example to others performing clean-ups at waste sites in Washington State, showing the government's commitment to hazardous waste destruction.

Ecology's general concerns about the proposed disposal work are as follows:

1. Will there be enough inspections and oversight by EPA during operation of the system to ensure that performance standards are maintained?
2. What parameters will be sampled and what are the performance standards for those parameters?
3. Will there be a wastewater discharge from any of the thermal treatment units? If so, where will that water go?

The applicable, relevant, and appropriate state requirements which you should be aware of are:

1. WAC 173-303 - State Dangerous Waste Regulations
2. RCW 90.48 - Water Pollution Control
3. WAC 173-201 - Water Quality Standards for Waters of the State of Washington

USEPA SF



1380030

SEP 16 1987

Superfund Branch

Mr. Jeff Webb
September 10, 1987
Page 2

4. RCW 70.105 and RCW 70.105A - Hazardous Waste Disposal and Regulation, respectively
5. RCW 70.94 Washington Clean Air Act
6. WAC 173-400 - General Regulations for Air Pollution Sources
7. WAC 173-403 - Implementation of Regulations for Air Containment Sources
8. WAC 173-490 - Emission Standards and Controls for Sources Emitting Volatile Organic Compounds

Ecology will provide whatever support we can to help see this site stabilization work through to completion.

Before start-up of the work on-site, Ecology would like to review and comment on site work plans, operation and monitoring plans, schedules, etc. We would like to review those types of documents to help insure the best "end product" possible. We will also be performing some inspections during operation of an on-site treatment system. Whatever assistance we can provide you, please let us know and we will see what we can work out.

Ecology is also interested in seeing more site characterization work being done, on- and off-site, prior to completing the site stabilization phase of work. Specifically, we would like to see more groundwater wells. The most recent groundwater data, from the existing wells, is several years old. The existing wells and some new wells, especially between American Crossarm and Dillenaugh Creek, would give us a much better handle on the extent of groundwater contamination. The proposed soil borings can easily be completed as monitor wells due to the shallow groundwater in the area.

This fall, I will send you a copy of Ecology's receiving water study on Dillenaugh Creek, once the lab data is in and the report is written. This work, done by Joe Joy of our Water Quality Investigation Section, looked at the sediments, water, and biota of the creek.

If you have any questions, please give me a call at (206) 438-3043.

Sincerely,

Mike Blum

Mike Blum, Site Manager
Hazardous Waste Cleanup Program

MB:md

cc: Michelle Anderson, EPA
Judy Belcher, Ecology